

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 20-CR-10314-LTS
	)	
ADMILSON PIRES	)	

DEFENDANT'S MOTION TO MODIFY RELEASE CONDITIONS  
[assented-to]

Admilson Pires, by his counsel, respectfully moves to modify his conditions of pretrial release. As ordered by this Court on December 12, 2020, Mr. Pires has successfully obtained employment. DE 16, ¶7(b). Mr. Pires will be working for a moving company that operates throughout New England, starting March 3, 2021. Specific information has been provided to USPO Marlenny Ramdehal.

The defendant requests the following modification to his release conditions:

1. The U.S.P.O. will switch the defendant from his current radio-frequency monitoring bracelet to a GPS monitoring bracelet.
2. The defendant must abide by a curfew of 9 p.m. - 6 a.m. daily. The defendant is no longer on an order of home confinement.
3. The defendant may travel outside the District of Massachusetts to Maine, New Hampshire, Vermont, Rhode Island and/or Connecticut, as required by his employer.
4. The defendant will notify U.S.P.O. prior to traveling outside of the District of Massachusetts for work.
5. The U.S.P.O. has discretion to modify the defendant's curfew for the purposes of accommodating his work schedule only.

The U.S. Probation Office, by Sr. Probation Officer Marlenny Ramdehal, and the U.S.

Attorney's Office, by Assistant United States Attorney Timothy Moran, assent to this motion.

Respectfully Submitted,  
ADMILSON PIRES  
By His Attorney,

/s/ Julie-Ann Olson

Julie-Ann Olson, B.B.O. #661464

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**CERTIFICATE OF SERVICE**

I, Julie-Ann Olson, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant, as identified on the Notice of Electronic Filing (NEF) on March 2, 2021.

/s/ Julie-Ann Olson

Julie-Ann Olson